

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*

Debtors.

X
:
Chapter 11

Case No. 09-50026 (MG)

(Jointly Administered)
:
X

CLOSING REPORT IN CHAPTER 11 CASE

To the best of my knowledge and belief, the following is a breakdown of fees and expenses in these cases from the Effective Date¹:

GUC TRUST LEGAL FEES AND EXPENSES	
Professional	Amount of Payment
Crowell & Moring LLP	\$3,795,870.51
Dickstein Shapiro LLP	\$12,144,631.74
Drinker Biddle & Reath LLP	\$5,066,272.14
Gibson Dunn & Crutcher LLP	\$23,566,003.26
Kelley Drye & Warren LLP	\$11,929,832.41 ²
Kramer Levin Naftalis & Frankel LLP	\$1,533,731.37
Morgan Lewis & Bockius LLP	\$136,566.39 ³
McDermott Will & Emery LLP	\$3,366,043.77
Weil Gotshal & Manges LLP	\$13,072,983.80

¹ Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to such terms in the *Debtors' Second Amended Joint Chapter Plan*, dated March 18, 2011 [ECF No. 9836] (the "Plan"). In accordance with the Plan, the Debtors formed various trusts – including the GUC Trust and the Avoidance Action Trust (the "AAT") – after the Effective Date. Also in accordance with the Plan, each of the Debtors was dissolved by December 15, 2011 and the Residual Wind-Down Assets were transferred to the GUC Trust upon the dissolution of the Debtors.

For professional fees and expenses paid in these cases from the Commencement Date through the Effective Date, please see the *Closing Report in Chapter 11 Cases* filed on March 22, 2013 [ECF No. 12361].

² This amount represents legal fees incurred by JPMorgan Chase Bank, N.A. in connection with the Avoidance Action brought by the AAT, which the GUC Trust was required to pay.

³ This amount represents legal fees incurred by JPMorgan Chase Bank, N.A. in connection with the Avoidance Action brought by the AAT, which the GUC Trust was required to pay.

GUC TRUST OTHER PROFESSIONAL FEES AND EXPENSES	
Professional	Amount of Payment
AlixPartners LLP	\$33,655,400.01
CohnReznick LLP	\$1,076,583.73
Deloitte Tax LLP	\$255,533.00
Donnelley Financial Solutions	\$305,110.00
Epiq / The Garden City Group, Inc.	\$2,856,677.70
FTI Consulting, Inc.	\$15,371,771.64
Frazier & Deeter, LLC	\$1,899,307.00
Mohamed F. Khimji	\$76,332.11
NERA Economic Consulting	\$199,645.18
Plante & Moran PLLC	\$2,320,384.43
R.R. Donnelley & Sons	\$303,192.00
Wilmington Trust	\$33,423,486.01
Zablocki Consulting LLC	\$779,579.70

GUC TRUST ALTERNATIVE DISPUTE RESOLUTION LEGAL COUNSEL FEES AND EXPENSES	
Professional	Amount of Payment
Angino & Rovner, PC	\$5,740.50
Bernard, Cassisa, Elliott & Davis	\$58,007.20
Blank & Rome LLP	\$1,997.75
Borden Ladner Gervais LLP	\$110,495.60
Bowman and Brooke LLP	\$564,887.50
Butler Snow O'Mara Stevens & Cannada PLLC	\$12,844.46
Butzel Long PC	\$146,918.41
The Claro Group LLC	\$12,337.61
Craddock Davis & Krause LLP	\$18,837.50
D McMurtry & Associates LLC	\$141,095.43
Dickinson Wright PLLC	\$4,820.50
DykemaGossett PLLC	\$629,508.41
Eckert Seamans Cherin & Mellott, LLC	\$313,951.07
Eldridge Cooper Steichen & Leach	\$8,833.69
Fiddler Gonzalez & Rodriguez, P.S.C.	\$945.00
Foster Swift Collins & Smith PC	\$8,623.20
Godfrey & Kahn S.C.	\$27,500.00
Hanson Bolkcom Law Group, LTD	\$129,399.27
Hardy, Lewis & Page PC	\$13,348.00
Hartline Dacus Barger Dreyer LLP	\$332,342.52
Honigman Miller Schwartz and Cohn LLP	\$1,263.70
Jenner & Block LLP	\$190,811.12
John R. Williams, Esq.	\$10,564.00
Jones Day	\$36,652.33
Jones Walker LLP	\$2,866.50
King & Spalding LLP	\$342,599.75
Lathrop & Gage LLP	\$35,694.42
McAfee & Taft	\$400.00
McKenna Long & Aldridge LLP	\$84,978.06
Miller, Johnson, Snell & Cumminskey PLC	\$4,578.30
Needham Kepner & Fish	\$11,437.49

O'Hagan Spencer LLP	\$15,941.04
Osler Hoskin & Harcourt	\$1,952.60
Pepper Hamilton LLP	\$980.62
Prichard Hawkins McFarland & Young LLP	\$2,591.10
Proskauer Rose LLP	\$333,112.37
Richards Layton & Finger	\$201,760.46
The Rose Law Firm PLLC	\$1,200.00
Rumberger Kirk & Caldwell, PA	\$61,636.76
Sedgwick LLP	\$38,545.75
Spencer LLP	\$12,842.50
Stewart McKelvey	\$60,129.80
Tansey Tracy & Convery, Esqs.	\$140,354.29
Thoits, Love, Hershberger & McLean	\$5,360.00
Thorn Gershon Tymann Bonanni, LLP	\$29,405.07
Togut, Segal & Segal LLP	\$251,374.22
Turner, Reid, Duncan, Loomer & Patton PC	\$16,358.30
Vincent Lopez Serafino Jenevein, PC	\$2,650.00
Young Ricchiuti Caldwell & Heller, LLC	\$15,457.50
Zausmer Kaufman August Caldwell & Tayler	\$10,947.07

GUC TRUST OTHER ADR PROFESSIONAL FEES AND EXPENSES	
Professional	Amount of Payment
ADR Systems	\$39,170.59
American Arbitration Association	\$24,800.00
Biodynamic Research Corporation	\$10,166.60
Burdin Mediations	\$8,750.00
Christopher Nolland	\$3,000.00
Econsult Corporation	\$3,200.00
Eric H. Holtzman	\$3,248.80
Exponent, Inc.	\$267,327.78
Francis Carling Mediation & Arbitration	\$11,940.00
Genex Services, Inc.	\$7,647.50
Gilbert Mediation Group	\$11,025.00
Glass Dispute Resolution	\$2,041.88
JAMS, Inc.	\$37,450.00
Jones Dykstra and Associates, Inc.	\$148,296.77
JP Research, Inc.	\$64,660.00
Kineticorp LLC	\$90,830.56
Linde LLC	\$27,793.02
Luscinia Research LLC	\$8,944.50
Mortality Research & Consulting	\$2,800.00
Phillips ADR Enterprises, P.C.	\$19,948.50
Ragan Research Corporation	\$6,080.00
Safety Forensics, PLLC	\$40,545.62
Sigma Actuarial Consulting Group	\$3,000.00
Superior Forensic Engineering, LLC	\$25,516.87
Watkins Meegan LLC	\$480,816.13

AAT LEGAL FEES AND EXPENSES	
Professional	Amount of Payment
Binder & Schwartz LLP	\$19,792,673.99
Blank Rome LLP	\$108,925.62
Crowell & Moring LLP	\$49,108.00
Davis Graham & Stubbs LLP	\$40,833.00
Dickstein Shapiro LLP	\$3,405,966.25
Emmett Marvin & Martin, LLP	\$150,189.05
Gibson, Dunn & Crutcher LLP	\$863,904.70
Young Conaway Stargatt & Taylor, LLP	\$1,137,024.02

AAT OTHER PROFESSIONAL FEES AND EXPENSES	
Professional	Amount of Payment
AFCO Insurance Premium Finance	\$940,540.88
AJG Advisors	\$1,344,791.76
AlixPartners LLP	\$109,729.95
AON PLC	\$1,244,100.00
Compass Lexecon	\$5,575,171.88
Duff & Phelps	\$88,952.70
Epiq / The Garden City Group, Inc.	\$197,005.09
Ernst & Young Global Limited	\$25,000.00
Frazier & Deeter, LLC	\$100,586.00
FTI Consulting, Inc.	\$1,380,495.76
Grant Thornton	\$361,604.25
Jardine Lloyd Thompson (JLT)	\$114,112.46
NFP	\$548,001.00
Stout Risius Ross, LLC	\$4,091,003.90
Turners	\$26,215.36
University Language System	\$34,095.00
Wilmington Trust	\$5,209,450.20

30.78 % DIVIDEND PAID/TO BE PAID

Dated: April 1, 2021
New York, New York

/s/ Kristin K. Going
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*Counsel to the Motors Liquidation Company
GUC Trust Administrator*